POLREP 05
12th Street Dump Site
(aka 12th Street Landfill Site)
near 12th Street ramp to I-495
Wilmington, DE 19802

ATTN: RRC

cc: A. Breslin
P. Welsh
Wilmington Council

I. SITUATION (as of 26 May 2000)
Event: CERCLA Removal Action

A. Removal activities at this Site now include preparatory steps for full mobilization anticipated for 30 May 2000. The Site vegetation has been cleared and utilities have been extended into the Site from nearby 12th Street. An Erosion and Sedimentation Control Plan for the first phase of activities at the Site has been prepared by Weston. A coy of the Plan has been submitted to DNREC for their consideration.

B. Access approval has been received from Norfolk and Southern Railroad and from the Delaware Department of Transportation to cross or utilize properties owned or controlled by these parties adjacent to the Site. These approvals enable the bulk of the Removal Action to begin.

C. Equipment and other assets belonging to a business adjacent to the Site remain in locations that will impede completion of the Removal Action. These equipment and assets are apparently located on three parcels of land. One parcel is owned by the Delaware Department of Transportation and one by the City of Wilmington (Economic Development Corp.). The OSC has discussed movement of these assets with their owner. Although the owner has pledged cooperation to move these equipment and assets in late April, very little has been done. The OSC estimates that the equipment will impede the Removal Action in about 45 days and has forwarded this information to EPA counsel.

D. The Action Memorandum establishes an Estimated Project Ceiling of $1983,000. The proposed distribution of funding is as follows:

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| ERRS (Guardian) | $ 1,623,000 |
| SATA (Weston) | $ 120,000 |
| EPA | $ 240,000 |
| TOTAL | $ 1,983,000 |

II. ACTIONS

A. Guardian completed cutting vegetation to ground level. Branches have been chipped and spread onto bare soil areas or piled. Large branches remain in a pile. Stumps remain in the ground. These larger items will be dealt with at a later time. Additional vegetation on the southern end of the Site was removed to allow a clear line of Site to the railroad to increase safety of crossing the tracks.

B. Guardian coordinated the installation of poles to support new electricity and telephone connections to the Site. These utilities have been installed to the Command Area of the Site.

C. The OSC directed Guardian to obtain and install a fence to surround the operational and command area to improve security at the Site. After removal of the vegetation, the number of trespassers to the Site area seemed to increase. At least one trespasser dumped a load of trash near the railroad tracks (a common practice as evidenced by the trash and debris in the area). The fence is installed at this time with a gate and signs.

D. Guardian has coordinated with the water utility to extend a service line to the Site. This service is extended from a valve near the railroad tracks and will be used for dust suppression, decontamination, and potable water service.

E. The OSC directed Guardian to arrange for sanitation units in the command trailers. These units will decrease the number of subcontractor trips across the tracks.

F. Weston completed the first phase of an Erosion and Sedimentation Control Plan. This document outlines how the Site roadway and staging areas will be implemented to reduce erosion from the Site. A sedimentation basin is also to be constructed to capture runoff from the Site. The Plan was completed 24 May and a copy was sent to DNREC for comment and consideration.

G. The OSC received results of toxicity tests on the contaminated soil at the Site. The test results indicate that arsenic and chromium pose more of a threat to ecological receptors (represented by earthworms) than does the lead at the Site. In general, samples containing elevated levels of arsenic or chromium (relative to other Site samples) do not necessarily contain elevated levels of lead. The OSC will review Site data and determine if lead can be used as a single tracer contaminant to guide Site activities and lead to a protective remedy.

H. The OSC met with representatives of NOAA and USFWS to discuss the results of toxicity testing and the future concepts for restoration of the Creek bank. Based upon consideration of the toxicity of the soils and habitat of the area, a capping effort that results in a minimum amount of synthetic material will be adopted. The OSC will balance the need for a non-erosive Creek bank with a desire for a natural bank. A seawall construction was evaluated and will no longer be considered. A soil cover will not likely provide sufficient protection against erosion at the water level. A soil cover with stone at the water level and near the existing seawall is a likely compromise.

ORIGINAL

I. Weston and the OSC met at the Site to evaluate the likely isolation barrier for separating the Site from the Brandywine Creek during the Removal Action. Due to the limited amount of level surface and abundance of angular rip rap, a portable dam or inflatable system was not deemed as effective as sheet pile. Thus, the OSC directed Weston to obtain appropriate geotechnical information to support installation of sheet pile. Weston held a pre-bid meeting at the Site on 23 May attended by subcontractors.

III. FUTURE ACTIONS

A. Continue review of ARARs provided by DNREC

B. Continue development of subsequent phases of the Erosion and Sedimentation Control Plan.

C. Coordinate with EPA, the City of Wilmington, DEDOT, and local business concerning the location of equipment and assets that may soon impede removal activities.

D. Construct access roads into and on the Site. This effort will require earth disturbance, grading, installation of a stabilized construction ramp, and other elements.

E. Mobilize the command area.

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Michael Towle, OSC
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